



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

CRH/JMH/EHS
F. #2017R00906

*271 Cadman Plaza East
Brooklyn, New York 11201*

January 14, 2022

By Email and USAFx

Kevin K. Tung
c/o Kevin Kerveng Tung PC
136-20 38th Avenue, Suite 3D
Flushing, New York 11354

Re: United States v. Yong Zhu
Criminal Docket No. 21-265 (PKC)

Dear Counsel:

Enclosed please find the following additional materials, which are being produced in accordance with the government's discovery obligations:

Description	Begin Bates	End Bates
Media reports related to Operation Fox Hunt	YZ-004354	YZ-004376
Select records from previously produced search warrant returns	YZ-004377	YZ-004532
Facebook records and data	YZ-004533	YZ-004541
Facebook records and data	YZ-005118	YZ-005118
Facebook records and data	YZ-005119	YZ-005119
Capital One records	YZ-004542	YZ-004720, YZ-005128
TD Bank records	YZ-004721	YZ-005117

Description	Begin Bates	End Bates
AT&T records	YZ-005120	YZ-005120
AT&T records	YZ-005121	YZ-005121
Locus records	YZ-005122	YZ-005122
Verizon records	YZ-005123	YZ-005123
Google records	YZ-005124	YZ-005124
Google records	YZ-005125	YZ-005125
Forensic report of mobile device	YZ-005126	YZ-005126
Data from extraction of mobile device	YZ-005127	YZ-005127

The materials are being provided subject to the protective order agreed to by the parties and entered by the Court on June 18, 2021. See ECF No. 70 (“the Protective Order”). The government considers the materials marked produced today that have been marked “SENSITIVE” to constitute “sensitive discovery material” as that term is defined in the Protective Order, and has identified such materials accordingly. See Protective Order ¶¶ 7-9. The government reiterates its request for reciprocal discovery from the defendant.

Very truly yours,

BREON PEACE
United States Attorney

By: /s/ Craig R. Heeren
Craig R. Heeren
J. Matthew Haggans
Ellen H. Sise
Assistant U.S. Attorneys
(718) 254-7000

Enclosures (via USAFx)

cc: Clerk of the Court (PKC) (by ECF) (without enclosures)